

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| In re Application of CHEVRON CORPORATION for | : |
| an Order Pursuant to 28 U.S.C. § 1782 to Conduct | : |
| Discovery for Use in Foreign Proceedings. | : |
| | : |
| ----- | X |

Case No. M-19-111

**[PROPOSED] ORDER TO SHOW CAUSE WHY CHEVRON CORPORATION
SHOULD NOT BE GRANTED LEAVE TO CONDUCT DISCOVERY FOR USE IN
FOREIGN PROCEEDINGS SHOULD NOT BE GRANTED**

Chevron Corporation ("Chevron") submitted an *Ex Parte* Application for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings ("Application") on August 4, 2010. By its Application, Chevron seeks discovery from Steven Donziger, an attorney licensed to practice law in the State of New York.

The Court has considered the evidence, arguments, and law presented, and sufficient reason appearing, the Court rules as follows. It is hereby:

ORDERED that Chevron Corporation shall serve Respondent Steven Donziger and counsel for the plaintiffs in the Lago Agrio Litigation and counsel for the Republic of Ecuador by hand, facsimile, or e-mail, with the Application and this Order no later than 5:00 p.m. on August __, 2010 (Mr. Donziger may be served by delivering the papers to the address provided for his registration with the New York State Unified Court System); and

ORDERED that papers in opposition to the Application, if any, shall be served by hand, facsimile, or e-mail upon Chevron's counsel, Gibson Dunn & Crutcher LLP, 200 Park Avenue, 47th Floor, New York, New York, on or before __:___ .m. on August __, 2010; and

ORDERED that a reply memorandum in support of the Application, if any, shall be served by hand, facsimile, or e-mail upon counsel for any party submitting opposing papers on or before __:__.m. on August __, 2010; and

ORDERED that Respondent Donziger, the Lago Agrio Plaintiffs, and the Republic of Ecuador show cause before this Court at a hearing on August __, 2010, at __:__, .m. or as soon thereafter as counsel can be heard, why an order should not be issued granting Chevron's Application.

IT IS SO ORDERED.

Dated: _____

United States District Judge